

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re: Juana Mateo	: Chapter 13
	: Bankruptcy No.17-00979
Debtor(s)	:
<hr style="width:50%; margin-left:0"/>	: 11 U.S.C. § 362

MTGLQ Investors, LP

Movant

vs.

Juana Mateo

Debtor(s)

and

Charles J. DeHart, III Esquire

Trustee

RESPONDENTS

**OBJECTIONS OF MTGLQ INVESTORS, LP TO CONFIRMATION OF DEBTOR'S(S')  
PROPOSED CHAPTER 13 PLAN**

MTGLQ Investors, LP, by and through its undersigned attorney, Sarah K. McCaffery, Esquire, hereby objects to the confirmation of Debtor's(s') proposed Chapter 13 Plan for the following reasons:

1. The pre-Petition arrears owed to MTGLQ Investors, LP are understated on Debtor's(s') proposed Chapter 13 Plan as \$0.00. The pre-Petition arrears owed to MTGLQ Investors, LP are \$17,426.12, which is set forth on its Proof of Claim that has been filed with this Court. Additionally, Debtor's plan seeks to reduce the principal balance of MTGLQ Investors, LP from \$72,052.67 to \$46,250.00. Accordingly, the Chapter 13 Plan does not properly address the pre-Petition claim of MTGLQ Investors, LP. *See* 11 U.S.C. Sec. 1325(a)(5).
2. Based on the information provided by Debtor(s) in Schedules I and J, Debtor(s) does/do not have sufficient monthly income to pay the correct amount of the pre-Petition arrears of MTGLQ Investors, LP over a forty seven (47) month period. Accordingly, Debtor's(s') proposed Chapter 13 Plan is not financially feasible. *See* 11 U.S.C. Sec. 1325(a)(6).
3. Debtor(s) need(s) to have an additional \$370.77 per month in order to pay the arrears of MTGLQ Investors, LP only, over a forty-seven (47) month period

remaining. There is absolutely no indication or evidence from Debtor's(s') Schedules that she/he/they has/have the ability to obtain such additional income. Accordingly, Debtor's(s') proposed Chapter 13 Plan is not financially feasible. *See* 11 U.S.C. Sec. 1325(a)(6).

4. Due to all of the defects in Debtor's(s') proposed Chapter 13 Plan, as aforesaid, such Plan could not have been proposed in good faith. *See* 11 U.S.C. Sec. 1325(a)(7).

WHEREFORE, MTGLQ Investors, LP prays that its objections be sustained and that confirmation of Debtor's(s') Chapter 13 Plan be denied.

/s/ Sarah K. McCaffery  
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